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Attorneys for Plaintiffs
I.E.I. Company Limited and International Education, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

I.E.I. COMPANY LIMITED, a Thailand corporation; **INTERNATIONAL EDUCATION, INC.**, a Seychelles corporation,

Plaintiffs,

vs.

ADVANCE CULTURAL EXCHANGE TRAINING CORPORATION, a California corporation, initially named herein as "Advance Cultural Education and Training Corporation"; **NAPAT VORAPUVADOL**, a/k/a Nawachol Boontham, an individual; **NARIN NATHRADOL**, a/k/a Monnipa Komolketruck, an individual; **SUPAWADEE POONDEJ**, a/k/a Supavadee Poondej, an individual; **DOES 1 through 10, inclusive**,

Defendants.

Case No. 4:09-CV-05079 PJH

**STIPULATION FOR LEAVE TO FILE
SECOND AMENDED VERIFIED
COMPLAINT AND FOR EXTENSION
OF TIME TO RESPOND THERETO**

**[Proposed] ORDER ON
STIPULATION AND CONTINUING
DEADLINES RE INITIAL
DISCLOSURES**

1 Plaintiffs I.E.I. Company Limited and International Education, Inc. ("plaintiffs")
2 and defendants Advance Cultural Exchange Training Corporation ("ACET"),
3 Supawadee Poondej ("Poondej"), Napat Vorapuvadol ("Vorapuvadol") and Narin
4 Nathradol ("Nathradol") (collectively "defendants") by and through their undersigned
5 counsel, stipulate and agree as follows:

6 1. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure,
7 defendants stipulate and agree that plaintiffs may file a Second Amended Verified
8 Complaint on or before January 11, 2010,

9 2. Pursuant to Civil Local Rule 6-2, plaintiffs and defendants stipulate and
10 agree that defendants shall have up to and including February 12, 2010 in which to
11 answer, move, or otherwise respond to the Second Amended Verified Complaint,
12 including but not limited to grounds based on personal jurisdiction and/or venue, if any.

13 3. This stipulation is made upon the following grounds and with the following
14 facts in mind:

15 (a) This stipulation has been agreed to by the parties due to the fact that (1)
16 plaintiffs wish to amend the pleadings to state a Lanham Act claim arising from
17 defendants' alleged use of plaintiffs' names and marks in the matters alleged in the
18 complaint; and (2) defendants ACET, Poondej, Vorapuvadol and Nathradol have
19 recently secured representation in this matter and wish to enter an appearance herein,
20 and their counsel will require additional time in which to investigate the matter and
21 prepare a response to the Second Amended Verified Complaint. Said counsel will also
22 be transitioning to a new law firm at the beginning of the new year. This stipulation will
23 allow for the accomplishment of the parties' objectives in those respects.

24 (b) There have been no previous time modifications in this case, whether by
25 stipulation or Court order.

26 (c) The stipulated extension of time for defendants' response to the
27 complaint, if agreed to by the Court, would result in the deadline for defendants'
28 response to the Second Amended Verified Complaint to be extended past several

1 currently set deadlines relating to the case management conference and the parties'
2 Rule 26 initial disclosures. The deadlines most likely to be affected by this extension
3 are as follows:

4 (1) January 7, 2010: Last court day for parties to confer re Rule 26 initial
5 disclosures and to file and serve ADR certification;

6 (2) January 21, 2010: Last court day to file case management statement and
7 Rule 26(f) report; and

8 (3) January 28, 2010, 2:00 p.m.: Initial case management conference.

9 In light of the matters covered by this stipulation and the extensions and leave
10 agreed to herein, the parties respectfully suggest to the Court that the above deadlines,
11 as well as any other appropriate deadlines, should be extended accordingly to such
12 dates as the Court may find are appropriate under the circumstances.

13 Respectfully submitted,

14 Dated: December 30, 2009

KRONENBERGER BURGOYNE, LLP

16 By: /s/ James V. Weixel, Jr.

17 Karl S. Kronenberger

18 James V. Weixel, Jr.

19 Attorneys for Plaintiffs,
20 I.E.I. COMPANY LIMITED and
INTERNATIONAL EDUCATION, INC.

21 Dated: December 30, 2009

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

24 By: /s/ Robert F. Hinton (per consent)

25 Robert F. Hinton

26 Attorney for Defendants, ADVANCE
27 CULTURAL EXCHANGE TRAINING
CORPORATION, SUPAWADEE POONDEJ,
NAPAT VORAPUVADOL and NARIN
28 NATHRADOL

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ORDER

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PURSUANT TO STIPULATION, IT IS ORDERED:

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1. Plaintiffs may file a Second Amended Verified Complaint on or before
January 11, 2010.

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2. Defendants shall answer, move, or otherwise respond to the Second
Amended Verified Complaint on or before February 12, 2010.

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3. The deadline for the parties' submission of Rule 26 initial disclosures and
case management statements, currently January 21, 2010, is continued to March 4 ___,
2010. All deadlines and other requirements imposed by the Federal Rules of Civil
Procedure, local rule, standing order of this Court, or otherwise are continued
accordingly and shall be calculated in accordance with the new date.

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4. The initial case management conference in this matter, currently
scheduled for 2:00 p.m. on January 28, 2010, is continued to March 11 ___, 2010, at
2:00 p.m. All deadlines and other requirements imposed by the Federal Rules of Civil
Procedure, local rule, standing order of this Court, or otherwise are continued and shall
be calculated in accordance with the new date.

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Dated: January 13, 2010

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